

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ALLEN ROBINSON,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No.: 2023 CV 02724
	)	
WAYNE FRANO, VINCENT CELIO,	)	
CARL BRASIC, TIMOTHY MCDERMOTT,	)	
JOHN FOLINO, JR., PATRICK CONROY,	)	
DAVID ZELIG, PETER BABICK and the	)	
CITY OF CHICAGO,	)	
	)	
Defendants.	)	

**DEFENDANT OFFICER DAVID ZELIG'S MOTION FOR EXTENSION OF TIME TO  
FILE RESPONSIVE PLEADING**

Now comes Defendant, David Zelig ("Zelig"), by and through his attorneys, Borkan & Scahill, Ltd., and for their motion for an extension of time to file a responsive pleading, up to and including July 24, 2023, state as follows:

1. Defendant Zelig responsive pleading to Plaintiff's complaint is due on June 26, 2023, Undersigned counsel has been retained to represent Defendant Zelig in this matter and has filed her appearance today.

2. Defendant Zelig requests an extension of time to file his responsive pleadings. Plaintiff's complaint is twenty-six pages and consists of 11 separate counts and 181 paragraphs (not including sub-paragraphs) and includes allegations of events that occurred over 15 years ago.

3. Plaintiff brings claims for violations of his due process rights, unlawful detention, malicious prosecution, failure to intervene, and conspiracy to violate Plaintiff's constitutional and state law rights.

4. Undersigned counsel seeks an extension of time up to and including July 24, 2023, to

file a responsive pleading on behalf of Defendant Zelig. This proposed deadline is aligned with the extensions of time sought by the City and County Defendants. (Dkt. 16).

5. This requested extension is not sought for purposes of delay but is needed to allow undersigned counsel to gather information and investigate the allegations in Plaintiff's Complaint. Furthermore, the requested extension may permit the Defendant Officers, including the unserved Defendant Officers, to file a collective responsive pleading on the same date rather than on separate dates.

6. No prejudice will be suffered by any party as a result of the requested extension.

7. Undersigned counsel conferred with counsel for Plaintiff, and Plaintiff has no objection to this motion.

WHEREFORE, Defendant, David Zelig, requests an extension of time to file his responsive pleadings, up to and including July 24, 2023, and for any other relief this Court deems appropriate.

Respectfully submitted,

BORKAN & SCAHILL, LTD.

By: /s/ Misha Itchhaporia  
Misha Itchhaporia

Steven B. Borkan  
Timothy P. Scahill  
Graham P. Miller  
Special Assistants Corporation Counsel  
BORKAN & SCAHILL, LTD.  
Two First National Plaza  
20 South Clark Street, Suite 1700  
Chicago, Illinois 60603  
(312) 580-1030  
*Attorneys for Defendant Officers*